

Jeffrey N. Pomerantz, Esq.
Andrew W. Caine, Esq.
(admitted *pro hac vice*)
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Boulevard, 13th Floor
Los Angeles, California 90067-4100
Telephone: (310) 277-6910
Telecopy: (310) 201-0760

Lynn L. Tavenner, Esq. (VA Bar No. 30083)
Paula S. Beran, Esq. (VA Bar No. 34679)
TAVENNER & BERAN, PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219
Telephone: (804) 783-8300
Telecopy: (804) 783-0178

*Counsel for the Circuit City Stores, Inc.
Liquidating Trust*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., <u>et al.</u> ,	:	Case No. 08-35653-KRH
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	

**NOTICE OF OBJECTION OF THE CIRCUIT CITY STORES, INC. LIQUIDATING
TRUST TO CLAIM NO. 14787 FILED BY CHASE BANK USA, NATIONAL
ASSOCIATION AND HEARINGS THEREON IF NECESSARY**

PLEASE TAKE NOTICE that the Circuit City Stores, Inc. Liquidating Trust (the “Liquidating Trust” and/or “Trust”), through Alfred H. Siegel, the duly appointed trustee of the Trust (the “Trustee”), pursuant to the Second Amended Joint Plan of Liquidation of Circuit City Stores, Inc. and its Affiliated Debtors and Debtors in Possession and its Official Committee of Creditors Holding General Unsecured Claims in the above-captioned cases of the above referenced estates of Circuit City Stores, Inc. et al. (collectively, the “Debtors”) filed the Objection to Claim No. 14787 Filed by Chase Bank USA, National Association (the “Objection”) with the United States Bankruptcy Court for the Eastern District of Virginia (the “Bankruptcy Court”). A copy of the Objection is being served upon you simultaneously with this notice (this “Notice”). By the Objection, the Liquidating Trust is seeking to disallow the identified claim.

YOUR RIGHTS MAY BE AFFECTED BY THE OBJECTION. THEREFORE,
YOU SHOULD READ THIS NOTICE (INCLUDING THE OBJECTION AND OTHER
ATTACHMENTS) CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY. IF
YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

MOREOVER, PURSUANT TO RULE 3007-1 OF THE LOCAL RULES OF THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA AND THE OMNIBUS OBJECTION PROCEDURES, UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE COURT AND SERVED ON THE OBJECTING PARTY BY 4:00 P.M. (EASTERN TIME) ON JUNE 26, 2012, THE COURT MAY DEEM ANY OPPOSITION WAIVED, TREAT THE OBJECTION AS CONCEDED AND ENTER AN ORDER GRANTING THE RELIEF REQUESTED WITHOUT A HEARING.

PLEASE TAKE FURTHER NOTICE THAT in connection with the Debtors' Chapter 11 Cases, a Supplemental Order Establishing Certain Notice, Case Management and Administrative Procedures [Docket No. 6208] (the "Case Management Order") was entered by the Court on December 30, 2009, which, among other things, prescribes the manner in which objections must be filed and served and when hearings will be conducted. A copy of the Case Management Order may be obtained at no charge at www.kccllc.net/circuitcity or for a fee via PACER at <http://www.vaeb.uscourts.gov>

If you do not want the Court to grant the relief sought in the Objection and/or the Motion, or if you want the Court to consider your views on the Objection and/or the Motion, then on or before **4:00 P.M. (EASTERN TIME) on June 26, 2012** you or your attorney must:

- ☒ File with the Court, at the address shown below, a written response with supporting memorandum pursuant to Local Bankruptcy Rule 9013-1 and the Case Management Order. You must mail or otherwise file it early enough so the Court will **receive** it on or before the due date identified herein.

Clerk of the Court
United States Bankruptcy Court
701 E. Broad Street, Suite 4000
Richmond, VA 23219

You must also serve a copy on:

Lynn L. Tavenner
Tavenner & Beran, PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219

Robert B. Van Arsdale, Esquire
Office of the United States Trustee
701 East Broad, Suite 4304
Richmond, Virginia 23219

If you or your attorney do not take these steps, the Court may deem any opposition waived, and issue orders granting the requested relief without further notice or hearing.

A status hearing on the Objection, as necessary, will be held at **2:00 p.m. (Eastern Time) on July 10, 2012 at:**

United States Bankruptcy Court
701 East Broad Street – Courtroom 5000
Richmond, Virginia 23219

Failure to File Your Timely Response. If you fail to file and serve any Response on or before the Response Deadline in compliance with the procedures set forth in this Notice, the Liquidating Trust will present to the Bankruptcy Court an appropriate order granting the relief requested in the Objection and the Motion without further notice to you.

Each Objection Is a Contested Matter. Each Claim subject to the Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Bankruptcy Court will be deemed a separate order with respect to such claim.

Dated: April 24, 2012

/s/ Lynn L. Tavenner

Lynn L. Tavenner (VA Bar No. 30083)
Paula S. Beran (VA Bar No. 34679)
TAVENNER & BERAN, P.L.C.
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219
Telephone: 804-783-8300
Facsimile: 804-783-0178
Email: ltavenner@tb-lawfirm.com
pberan@tb-lawfirm.com

-and-

Jeffrey N. Pomerantz (admitted *pro hac vice*)
Andrew W. Caine (admitted *pro hac vice*)
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Blvd.
11th Floor
Los Angeles, California 90067-4100
Telephone: 805-123-4567
Facsimile: 310/201-0760
E-mail: jpomerantz@pszjlaw.com
acaine@pszjlaw.com

*Counsel for the Circuit City Stores, Inc.
Liquidating Trust*

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of April, 2012, I caused a copy of the foregoing Notice of Objection of the Circuit City Stores, Inc. Liquidating Trust to Claim No. 14787 Filed By Chase Bank USA, National Association to be served in accordance with the Case Management Order and via certified mail (return receipt requested), and/or via first-class mail, postage prepaid, to the following:

By Certified Mail (Return Receipt Requested) and First-Class Mail:

Chase Bank USA, National Association
Attn: Daniel P. Tierney, General Manager
201 North Walnut Street
3 Christina Center
Wilmington, DE 19801

Chase Bank USA, National Association
Attn: Officer or Managing/General Agent
200 White Clay Center Dr.
Newark, DE 19711

Chase Bank USA, National Association
Attn: Keith W. Shuck, President
White Clay Center
Building 200
Route 273
Newark, DE 19711

By First-Class Mail upon:

Weil, Gotshal, & Manges LLP
Attn: Gary T. Holtzer, Esq.
Joseph Gelb, Esq.
Aliza Reicher, Esq.
767 Fifth Avenue
New York, NY 10153
Counsel for Chase Bank USA, National Association

Kutak Rock LLP
Attn: Michael A. Condyles
Kimberly A. Pierro
Bank of America Center
1111 East Main Street
Suite 800
Richmond, VA 23219-6192
Counsel for Chase Bank USA, National Association

/s/ Lynn L. Tavenner

Lynn L. Tavenner, Esquire (VA. Bar No. 30083)